

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONERFILED
HARRISBURG PA

JUL 24 2025

PER *M* DEPUTY CLERKIN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Full Name of Plaintiff : Jeremiah Wood 05-31276 : 4:25-CV-1355-DFB

Inmate Number : Civil No. former 125-CV-1001

(to be filled in by the Clerk's Office)

Name of Defendant 1 : (✓) Demand for Jury Trial

DA Tom Marino : () No Jury Trial Demand

48 W 3d Street
Williamsport PA 17701

Name of Defendant 2 :
ASST. DA JESSICA Faese Epst
48 W 3d Street
Williamsport PA 17701

Name of Defendant 3 :
Lieutenant Rogers et al.
48 W 3d Street
Williamsport PA 17701

Name of Defendant 4 :
Head Judge Nancy Buffis
48 W 3d Street
Williamsport PA 17701

Name of Defendant 5 :
(Print the names of all defendants. If the names of all
defendants do not fit in this space, you may attach
additional pages. Do not include addresses in this
section).

I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.

- Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)
- Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)
- Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

Constitution 8th amendment

Defendant 2:

W^{illiam} Carver William

Name (Last, First)

Common Pleas Judge

Current Job Title

48 W 3d Street

Current Work Address

Williamsport PA 17701

City, County, State, Zip Code

Defendant 3:

Thomas Marino

Name (Last, First)

District Attorney

Current Job Title

48 W 3d Street

Current Work Address

Williamsport PA 17701

City, County, State, Zip Code

Defendant 4:

Assistant DA Jossical Feese

Name (Last, First)

Assistant DA

Current Job Title

48 W 3d Street

Current Work Address

Williamsport PA 17701

City, County, State, Zip Code

Defendant 5:

Common Pleas

Head Judge Franklin Street

Head Common Pleas Judge

Current Job Title

48 W 3d Street

Current Work Address

Williamsport PA 17701

City, County, State, Zip Code

III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

A. Describe where and when the events giving rise to your claim(s) arose.

Plaintiff submits the additional factors related to suit for summary and trial relief against Indictor Brett Carrucci and DA Mariano and Asst. DA Foss, in amending the complaint in former case No. 125-cv-1001 - after

B. On what date did the events giving rise to your claim(s) occur?

(Case #125) Plaintiff and I had planned several days following last (see below) related to the additional, amended complaint relief:

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?)

1. Plaintiff Wood is incarcerated in Laramie County Jail

On 7/17/25 Plaintiff requested on a hearing before Common Pleas Judge Arthur, who Head Common Pleas Judge Brett sequestered, with Assistant DA Foss, when Mariano approves, an emergency or expedited furlough request to visit his terminally ill son in hospice (also called a respite)

2. Physicians informed Wood and this two weeks ago Monday, they said the

4. Assistant DA did not oppose furlough, but asked court to impose and/or monitor on Wood.

5. Subsequently, Brett advised Arthur hold no would only allow furlough if

a). be escorted by Constable

b). pay for Constable

(See back)

c. be clothed in prison clothing

d. have ^{WMS} shackles and ankle
shackles

e. Be in custody of constables

f. visit for maximum of 2 hours

6. Weeds' P.D. Richard Dixon argued

these conditions were unrealistic

and onerous, even impossible.

(Arguably argumentative under Twombly/Iqbal).

7. Incarcerated plaintiff lacks the means,
financial and otherwise, to a) hire

a constable (fact Ta);

b. find a constable to hire (fact Tb)

8. Witness Probation officer Christopher
Lavallee has depicted Weeds as

a menace to society. (arguably argumentative)

9. Plaintiff asks court to take notice of
Williamson Sim Gazette article Matthew Carror, A Blessing!
mother looks back on journey to bring son home after 831 days;
Friday May 16, 2025 (discussing) financial strain of travel
expenses and childcare. The amount of stress -->
feeling unwell... panic attacks --> [related to]
bronchopulmonary aplasia and bronchomalacia SOT
syndrome" of her son Jaxyn, the son of
plaintiff Weeds.

IV. LEGAL CLAIM(S)

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

Plaintiff argues the Judge's stay grants imposition of unrealistic and impossible foreign conditions which do facts prevent Wood from visiting his dying son, constitutes cruel and unusual punishment under the 8th Amendment of Constitution, as incorporated by the 14th Amendment and Section 1883.

Universal abstention does not apply because this foreign request falls under the auspices legally of a bail denial, and under Section 14th Amendment does not apply to bail, or a foreign which is a form of bail in wood environs case (he has not yet gone to trial or convicted) so foreign falls onto

V. INJURY

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

Irreparable grievous denial of wood spending time with his dying son.

VI. RELIEF

State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

Fairable relief - Emergency wif of
Mardamis attorney Judie Pitts and California
to permit to have visit in street clothes
with ankle monitor, with any police or
carsonia expenses billed to Wood account
as with other fines and fees (back)

Equitable relief applies because the Judge Carlucci acts in bad faith in seeking retaliation for Wood's past bad acts, which should not have been allowed into evidence under the prohibition against character evidence.

Judge Carlucci knowingly ignored the character evidence he impliedly by claiming Wood would be a danger to the child, a claim with no factual basis.

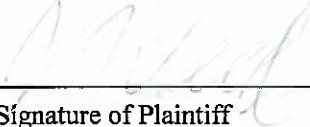
In doing so Judge Carlucci knowingly ignored the categorical imperative of family law - best interest of child - and it is in the child's best interest to see his father before dying.

Judge Carlucci's ghoulish, unrealistiz conditions should be enjoined and a writ of mandamus ordered visit as discussed above.

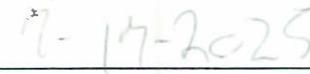
VII. SIGNATURE

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

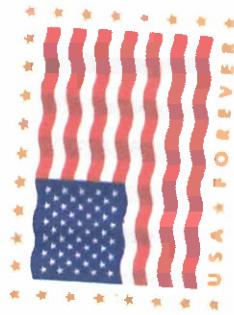
Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.



Signature of Plaintiff



Date



Inmate Name J. French Reed Inmate # Q5-31276
Licking County Prison
P.O. Box 247
Paxton, MD 21131-0247

Office of Clerk
MIDDLE DISTRICT OF PENNSYLVANIA
1501 North 6th Street Suite 101
Harrisburg, PA 17102

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